



Hilda Piloto
Phone: (305) 428-4504
Fax: 305.374.4744
hilda.piloto@saul.com
www.saul.com

March 12, 2025

VIA ECF

Hon. Lewis J. Liman
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street New York, NY 10007

RE: *Lateral Recovery LLC, et al. v. Funderz.net, LLC, et al.*
Case No. 1:22-cv-02170-LJL

Dear Judge Liman:

We represent Defendants Funderz.net, LLC and Joseph Yitzchakov in the above-referenced matter. We write to respectfully request an adjournment of all deadlines set forth in this Court's order dated November 6, 2024. [ECF No. 176]. Defendants also seek to adjourn the trial date of April 14, 2025. *See Id.*

This request is being made because Defendants' counsel, Stephanie Denker, is scheduled to continue a jury trial in the matter of *MEPT Lincoln Crossing, LLC v. Towers Associates, Ltd., et al.*, Superior Court of New Jersey, Law Division, Civil Part, Hudson County Docket No. HUD-L-003357-19, which commenced on January 27, 2025¹ and is now scheduled to conclude on or about April 10, 2025. *See* Exhibit A. In addition, the current trial in this lawsuit is scheduled for the week of Passover, rendering Defendant, Joseph Yitzchakov, and Defendant Funderz.net, LLC's corporate representative, Lauren Statemen, unavailable due to their religious obligations.

This is the first request to adjourn the deadlines set forth in this Court's order dated November 6, 2024 and the trial. Plaintiffs do not consent to this request due to collection concerns.

Thank you for your consideration.

Respectfully submitted,

Hilda Piloto

Hilda Piloto (admitted pro hac vice).

cc: All Counsel of Record (via ECF)

¹ Although the trial began on January 27, 2025, the Court began the Prequalification of Jurors on January 13, 2025.